

IN THE SUPREME COURT OF FLORIDA

INQUIRY CONCERNING A
JUDGE, NO. 02-487

Supreme Court
Case No. SC03-1171

RESPONSE OF JUDGE GREGORY P. HOLDER TO THE
FLORIDA JUDICIAL QUALIFICATIONS COMMISSION'S
THIRD SET OF INTERROGATORIES

Respondent Judge Gregory P. Holder files this Response to the Florida Judicial Qualifications Commission's Third Set of Interrogatories, filed November 24, 2003.

Definitions

The following definitions apply:

- A. "You" means you personally, your attorneys, or your agents.
- B. "The Paper" means the Air War College paper marked as Exhibit 5 to the deposition of Colonel William O. Howe, Jr., taken November 20, 2003.
- C. "Exhibit A" means the Air War College paper attached as Exhibit "A" to the Notice of Formal Charges.

Interrogatories

1. State the date when you first received the Paper.

December 2, 2003

2. State the name and address of the person from whom you obtained or received the Paper.

Patricia T. Williams
Walter Williams
Williams Printing & Graphics Co.
4733 Rittiman Road
San Antonio TX 78218

3. State the name and address of the person who placed the date stamp on the Paper.

Patricia T. Williams
Walter Williams
Williams Printing & Graphics Co.
4733 Rittiman Road
San Antonio TX 78218

4. State whether you claim that the Paper is the one you submitted to the Air War College as your paper.

No.

5. If the answer to Interrogatory No. 4 is no, state:

a. Who prepared the Paper;

Patricia T. Williams
Walter Williams
Williams Printing & Graphics Co.
4733 Rittiman Road
San Antonio TX 78218

b. When was the Paper prepared;

November 2003

and

c. How the Paper was prepared.

The paper was prepared through the use of off-the-shelf software programs. Specifically, Adobe Photoshop 6.0 and QuarkXPress 5.0, both used primarily in the printing and graphics industry to change the appearance of any printed material or picture/photograph.

6. With respect to the handwriting on the Paper, state:

a. Whether you contend it is Lieutenant Colonel Howe's handwriting;

Colonel Howe has identified it as his.

b. how the handwritten words that appear on Exhibit "A" that are not on the Paper were deleted or redacted;

The paper was prepared through the use of off-the-shelf software programs. Specifically, Adobe Photoshop 6.0 and QuarkXPress 5.0, both used primarily in the printing and graphics industry to change the appearance of any printed material or picture/photograph.

- c. how handwritten words that appear on pages 2, 4, 5, 8, 9, 12, 14, 15, 16, 17, 19 and 21 of Exhibit "A" were rearranged, moved around or added on the Paper.

The paper was prepared through the use of off-the-shelf software programs. Specifically, Adobe Photoshop 6.0 and QuarkXPress 5.0, both used primarily in the printing and graphics industry to change the appearance of any printed material or picture/photograph.

7. With respect to the issues in this proceeding, what do you contend that the Paper proves or tends to prove.

Without question, this paper is just one example of how any printed document or picture/photograph can be changed to appear to be authentic. Needless to say, if a document or picture/photograph can be “contrived” and “changed,” it can conceivably have a deleterious effect, or positive effect, depending on the whim of the graphics designer, especially when these “changes” do not have pre-approval by the author or artist/photographer (or their subject).

AFFIDAVIT

STATE OF FLORIDA)
)
)ss
COUNTY OF HILLSBOROUGH)

Gregory P. Holder, being first duly sworn, deposes and says that he has reviewed the foregoing answers to interrogatories, and that said answers are true and correct.

Judge Gregory P. Holder

The foregoing instrument was acknowledged before me this ____ day of December, 2003, by _____. Such person did take an oath and () is personally known to me or () produced a current Florida driver's license as identification, number _____.

Name, typed, printed or stamped
NOTARY PUBLIC, STATE OF FLORIDA
Commission Number: _____
My Commission Expires: _____

Certificate of Service

I certify that on December 11, 2003, the original Response of Judge Holder to the Judicial Qualification Commission's Third Set of Interrogatories, together with a diskette containing the document in Word Perfect format, has been sent by overnight delivery for filing to the Clerk of the Court, Florida Supreme Court, 500 S. Duval Street, Tallahassee FL 32399-1927; and that duplicates of the original were served by telecopier and U.S. Mail to: JQC Special Counsel, Charles P. Pillans, III, Esq., Bedell Ditmar DeVault Pillans & Coxe, P.A., The Bedell Building, 101 East Adams Street, Jacksonville, FL 333202; and to JQC General Counsel, Thomas C. MacDonald, Jr., 1904 Holly Lane, Tampa, FL 33629.

Attorney